



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10



State of Oregon  
Department of  
Environmental  
Quality

**CERTIFIED MAIL NUMBER - RETURN RECEIPT REQUESTED**

Mr. W.L. Briggs  
President and Registered Agent  
Oil Re-Refining Company Inc.  
4150 N. Suttle Road  
Portland, OR 97217

Re: Requirement to Provide Information

Dear Mr. Briggs:

As you know, the Environmental Protection Agency (EPA) and the Oregon Department of Environmental Quality (ODEQ) have been conducting an investigation of air quality in the vicinity of Hayden Island in Portland, Oregon. We appreciate the cooperation of Oil Re-Refining Company Inc. (ORRCO) during EPA and ODEQ's joint inspection of its facility at 4150 N. Suttle Road, Portland, Oregon (Facility) during the week of February 8, 2016, and the records ORRCO provided in follow-up to that inspection.

Under Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414, EPA is authorized to require the submission of records, reports, and other information for the purpose of determining whether any violations of the CAA have occurred and for carrying out other purposes of the CAA. Under Oregon Administrative Rule (OAR) 340-212-0120, ODEQ is authorized to require the submission of records, reports, and other information for the purpose of determining the type, quantity, quality, and duration of emissions. This authority includes, for both EPA and ODEQ, the authority to require the sampling of emissions.

In accordance with this authority, you are hereby served the enclosed Information Request. The Information Request requires ORRCO to provide the requested information and documents regarding the Facility's operations in accordance with and in the time frames specified in

Enclosures 1 and 2. Please see Enclosure 1 for instructions and definitions, including instructions regarding the submission of confidential business information. The requested information and documents are set forth in Enclosure 2. Please note that this is the first of one or more additional Information Requests EPA and ODEQ intend to issue to APES.

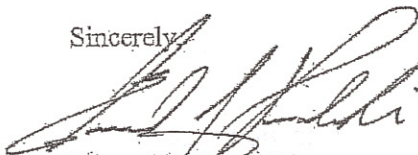
We request that you sign and return the enclosed Statement of Certification with your responses to this Information Request.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to this Information Request in a timely manner may lead to enforcement action by EPA or by ODEQ (or both) to obtain compliance or to recover a civil penalty. Responses that are incomplete, ambiguous, or evasive may be treated as noncompliance with this Information Request. In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal liability. In addition, even if you fully comply with this Information Request, you may still be subject to administrative, civil, or criminal action by EPA or ODEQ (or both) as provided under their respective applicable laws.

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Thank you for your cooperation in this matter. Any technical questions regarding this Information Request should be directed to Katie McClintock (206) 553-2143; for legal matters, contact Julie Vergeront, Office of Regional Counsel, at (206) 553-1497.

Sincerely,



Edward J. Kowalski  
Director, Office of Compliance and Enforcement  
EPA, Region 10



Gerald Ebersole  
Acting Northwest Region Air Quality Manager  
Oregon Department of Environmental Quality

IN THE MATTER OF: )  
 )  
Oil Re-Refining )  
Company Inc. )  
 )  
Portland, Oregon, )  
Respondent. )  
\_\_\_\_\_ )

STATEMENT OF CERTIFICATION

I, \_\_\_\_\_ hereby certify that the enclosed response to the above-captioned Information Request is true, accurate, and complete. I certify that the portions of this response which I did not personally prepare were prepared by persons acting on behalf of the Respondent, under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I make this certification both on my own behalf, and on behalf of the Respondent, as its authorized representative.

Dated: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_





**ENCLOSURE 1 – INFORMATION REQUEST TO  
OIL RE-REFINING COMPANY INC.**

**A. INSTRUCTIONS**

1. Send a complete response to each question in the Information Request by the time period specified for that question to each of the following addresses:

Katie McClintock, OCE-101  
U.S. Environmental Protection Agency  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101

And

Louis Bivins  
Oregon Department of Environmental Quality  
700 NE Multnomah St., Suite #600  
Portland, OR 97232

2. Provide a separate narrative response to each question and subpart of a question set forth in the Information Request.
3. Precede each answer with the number of the question to which it corresponds and at the end of each answer identify the person(s) that provided information that was used or considered in responding to that question; each person who was consulted in the preparation of that response; each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question. In addition, provide a true and correct copy of each such document if not provided in response to another specific request herein.
4. Indicate on each document produced in response to this information request, or in some other reasonable manner, the number of the question to which it corresponds.
5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.
6. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide a corrected response as soon as possible.
7. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

## **B. DEFINITIONS**

The following definitions apply to this Information Request. All terms not defined herein shall have their ordinary meaning unless such terms are defined in the Clean Air Act or its implementing regulations.

The "company" refers to either the owner or operator of the facility, or both. If a question would have a different response because the owner and operator are different entities, the response must be made in relation to both.

1. "Facility" means the Oil Re-Refining Company Inc. facility located at 4150 N. Suttle Road, Portland, Oregon 97217.
2. "EPA" means the U.S. Environmental Protection Agency.
3. "ODEQ" means the Oregon Department of Environmental Quality.
4. "Delivery" means each time a truck delivers oil/oily liquid or material to the Facility for processing, either from trucks owned by the company or other trucks.
5. "Hazardous waste" means "hazardous waste" as defined in 40 C.F.R. § 261.3.
6. "PPM" means parts per million.
7. "Document" means any object that records, stores, or presents information, and includes writings, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include: (a) any copy of each document which is not an exact duplicate of a document which is produced, (b) each copy which has any writing, notation, or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every other document referred to or incorporated into each document.
8. The terms "person" or "entity" has the same definition as "person" as defined in Section 302(e) of the Clean Air Act, and shall include any individual, association, corporation, partnership, or any federal, state, or local governmental entity.
9. The terms "you" or "Respondent" means the addressee of this Request, and the addressee's subsidiaries, divisions, officers, directors, managers, employees, contractors, trustees, partners, successors, assigns, attorneys, and agents, as applicable.
10. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.



### **C. CONFIDENTIAL BUSINESS INFORMATION**

The requested information must be submitted whether or not you regard part or all of it as a trade secret or confidential business information.

#### **For responses submitted to EPA:**

You may, if you desire, assert a business confidentiality claim covering part or all of the information submitted pursuant to Sections 114(c) of the Clean Air Act, 42 U.S.C. § 7414(c), and 40 C.F.R. Part 2, Subpart B. All information claimed as confidential should be contained on separate sheet(s) and should be clearly identified as "confidential," "trade secret," or "proprietary." Please note that you bear the burden of substantiating your confidentiality claim.

Unless you make a claim at the time that you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. The information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. Additional rules governing certain information obtained under the CAA appear in 40 C.F.R. § 2.301. You should read the above cited statutes and regulations carefully before asserting a business confidentiality claim because certain categories of information, including "emission data" (which includes information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of emissions data), are not entitled to confidential treatment.

#### **For responses submitted to ODEQ:**

You may, if you desire, assert a business confidentiality claim covering part or all of the information submitted pursuant to Oregon Revised Statute (ORS) 192.501(2) and Oregon Administrative Rule (OAR) 340-214-0130. All information claimed as confidential should be clearly marked with the request for exemption from disclosure, including marking as "confidential" or "trade secret" each page of a multi-page document that you believe is confidential, clearly distinguishing between material exempt from disclosure and non-exempt material, and, if possible, placing exempt confidential material on separate pages from non-exempt material.

For a writing to be considered exempt from disclosure as a "trade secret," it must not be patented, it must be known only to a limited number of individuals within the company who have made efforts to maintain the secrecy of the information, the information must derive actual or potential economic value from not being disclosed to other persons, the material must give its users the chance to obtain a business advantage over competitors not having the information, and it must not be emissions data.

Unless you make a claim at the time that you submit the information in the manner described in OAR 340-214-0130, it may be made available to the public by ODEQ without further notice to you. The information covered by such a claim will be disclosed by ODEQ only to the extent and by the procedures set forth ORS 192.410 through ORS 192.505. You should read the above cited statutes and regulations carefully before asserting a business confidentiality claim because certain categories

of information, including “emission data” (which includes information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of emissions data), are not entitled to confidential treatment.



**ENCLOSURE 2 – INFORMATION REQUEST TO  
OIL RE-REFINING COMPANY INC.**

1. By May 2, 2016: Submit the following information for each Delivery of used oil/oily liquid or material to the Facility for processing between August 1, 2015 and seven days after the date of receipt of this Information Request:
  - a. For each Delivery:
    - i. The name and address of the generator(s) of the used oil/oily liquid or material in the delivery;
    - ii. The amount of used oil/oily liquid or material in the Delivery (gallons);
    - iii. The date the Delivery was received at the Facility;
    - iv. The date(s) the Delivery was processed at the Facility;
    - v. The concentration of halogens (measured by a Clor-D-Tect test or otherwise) of the used oil/oily liquid or material in the Delivery and the method used to determine the concentration;
    - vi. The concentration of polychlorinated biphenyls (PCBs) in the used oil/oily liquid or material in the Delivery and the method used to determine the concentration; and
    - vii. Any other documents (from the generator(s) or otherwise) regarding the content of the used oil/oily liquid or material in the Delivery.
  - b. To the extent the company, in accepting the used oil/oily liquid or material in the Delivery for processing, relied on a rebuttal of the presumption in 40 C.F.R. § 279.10(b)(1)(ii) that it is presumed to be a hazardous waste, all records the company is relying on to rebut that presumption, including records of any analysis done to determine why the total halogen concentration exceeded 1000 ppm or to determine that the used oil/oily liquid or material in the Delivery is not a hazardous waste.
  - c. For any Delivery rejected by the company for processing for any reason, all documents discussing the reason for rejecting the Delivery.
2. Beginning seven days after receipt of this Information Request until October 1, 2016: Record and submit information for each Delivery of used oil/oily liquid or material to the Facility for processing as follows:
  - a. Maintain records of the following information:
    - i. The name and address of the generator(s) of the used oil/oily liquid or material in the Delivery;
    - ii. The amount of used oil/oily liquid or material in the Delivery (gallons);
    - iii. The date the Delivery was received at the Facility;
    - iv. The date(s) the Delivery was processed at the Facility;
    - v. The results of any test to determine the concentration of halogens (measured by a Clor-D-Tect test or otherwise) of the used oil/oily liquid or material in the Delivery, including multiple results if the test was

- conducted before and after adding water to remove salt and the method used to determine the concentration;
- vi. The results of any test to determine the concentration of PCBs in the used oil/oily liquid or material in the Delivery and the method used to determine the concentration;
  - vii. Any other documents received (from the generator(s) or otherwise) regarding the content of the used oil/oily liquid or material in the Delivery.
  - viii. To the extent the company, in accepting the used oil/oily liquid or material in the Delivery for processing, intends to rebut the presumption in 40 C.F.R. § 279.10(b)(1)(ii) that the used oil/oily liquid or material is a hazardous waste under that regulation, an explanation, with supporting documentation, of why the company believes that the used oil/oily liquid or material is not a hazardous waste, including records of any analysis done to determine why the total halogen concentrations exceeded 1000 ppm or to determine that the used oil/oily liquid or material in the Delivery is not a hazardous waste. If the facility processes the used oil/oily liquid or material to determine if the chloride reading was influenced by salt water or if it is screened for a particular chemical, describe the steps in that process and the results of each step; and
  - ix. For any Delivery rejected by the company for processing for any reason, an explanation of the reason for rejecting the Delivery, along with supporting documentation.
- b. Submit the information required by Paragraph 2.a above on a bi-weekly basis as follows:
    - i. For each bimonthly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the required information for each Delivery received during that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the 6<sup>th</sup> of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month).
3. Beginning seven days after receipt of this Information Request until October 1, 2016: Sample and analyze the content of each Delivery containing used oil/oily liquid or material received at the Facility for processing, record the specified information, and submit the information as follows:
- a. Before processing the Delivery, sample and analyze the content of each individual Delivery for the items in Paragraph 3.c below. A sample of each individual Delivery is not required if multiple Deliveries are stored in the same tank at the Facility and a sample of the tank is taken for analysis before any material is processed from that tank.
  - b. For any sample analysis not done onsite, send the sample out for analysis within two days of taking the sample and request sample results from the company performing the analysis within one week of receipt of the sample.



- c. Conduct sampling to determine the following for each Delivery:
    - i. Sulfur content (% sulfur) of the used oil/oily liquid or material in the Delivery; and
    - ii. Water content (% water) of the used oil/oily liquid or material in the Delivery.
  - d. Record the following information for each Delivery and each sample taken:
    - i. The truck or tank number/designation from which the sample was taken;
    - ii. The date the sample was taken;
    - iii. The name of the person taking the sample;
    - iv. The name and address of the generator(s) of the used oil/oily liquid or material in the Delivery that was sampled;
    - v. The amount of used oil/oily liquid or material in the Delivery (gallons);
    - vi. A description of the used oil/oily liquid or material in the Delivery;
    - vii. Sulfur content (% sulfur) of the sample;
    - viii. Water content (% water) of the sample;
    - ix. The date the Delivery was received at the Facility; and
    - x. The date(s) the Delivery was processed at the Facility;
  - e. Submit records required by Paragraph 3.d above on a bi-weekly basis as follows:
    - i. For each bimonthly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the required information for each Delivery received during that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the 6<sup>th</sup> of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month) except as provided in Paragraph 3.d.ii below.
    - ii. Submit the required records for a Delivery for which the sample was sent offsite for analysis as part of the bi-weekly submission due immediately following the company's receipt of the sample results.
4. Calibrate, maintain and operate a handheld monitor for hydrogen sulfide (H<sub>2</sub>S) to measure and record H<sub>2</sub>S concentrations (in ppm) at the Facility as follows:
- a. By May 2, 2016: Develop and submit for review a monitoring plan to measure and record H<sub>2</sub>S emissions at the Facility once per shift with a handheld monitor that is appropriate for detecting H<sub>2</sub>S emissions at the Facility at concentrations of 1 ppm or greater. The plan must include:
    - i. Product specifications for the specific monitor to be used;
    - ii. A list of the operators at the Facility certified/trained to use the H<sub>2</sub>S monitor;
    - iii. The locations in the Facility to be monitored once per shift, including, at a minimum, a reading at the north, south, east, and west fence lines of the Facility and a reading directly downwind of the plumes of all burners, boilers, heaters, incinerators, or other emission points at the Facility at the fence line or any closer location just before where the plume reaches the ground before the fence line;

- iv. A recordkeeping plan for the reading at each location that includes:
    - 1. The time and date of the reading;
    - 2. The name of the person taking the reading;
    - 3. Any problems encountered in performing the reading;
    - 4. The H<sub>2</sub>S concentration measured;
    - 5. The estimated wind direction at the time of the reading; and
    - 6. A sample record for conducting the readings;
  - v. A calibration and maintenance plan for the H<sub>2</sub>S monitor.
  - b. Within seven days of receipt of comments from either EPA or ODEQ on the monitoring plan: Revise the monitoring plan to address the comments.
  - c. Beginning May 16, 2016 until October 1, 2016: Measure H<sub>2</sub>S concentrations at the Facility in accordance with the monitoring plan (as revised).
  - d. Submit records of the monitoring results on a bi-weekly basis as follows:
    - i. For each bimonthly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the records for the monitoring conducted during that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the 6<sup>th</sup> of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month).
5. Sample emissions from emission points/stacks at the Facility as follows:
- a. By May 2, 2016: Develop and submit for review a plan to measure concentrations of H<sub>2</sub>S, sulfur dioxide (SO<sub>2</sub>), benzene, chloroform, naphthalene, 1,4-dioxane, and chlorine gas emissions from each emission point/stack at the Facility once per week using the Matheson-Kitagawa Toxic Gas Detection System (or similar sampling tube system) in accordance with the sampling system manufacturer's instructions. The plan must include:
    - i. A list of the operators at the Facility certified/trained to use the tube sampling system;
    - ii. The emission points/stacks at the Facility to be sampled, including all burners, boilers, heaters, incinerators, scrubbers, and uncontrolled process stacks;
    - iii. A recordkeeping plan for each sample collected that includes:
      - 1. The time and date of the sampling;
      - 2. The name of the person conducting the sampling;
      - 3. The specific equipment used;
      - 4. The specific tube used;
      - 5. Any problems encountered in performing the sampling;
      - 6. The concentration measured;
      - 7. High definition color photographs of each sampling tube before and after injection of the process gas (each tube shall be visibly labeled in the photographs);
      - 8. Any calibration and maintenance records specified by the equipment manufacturer;



9. The method used to estimate or measure volumetric flow rate of each emission point/stack; and
  10. A sample record for conducting the sampling;
  - iv. A requirement that all sampling tubes used for weekly monitoring be manufactured by the sampling system's manufacturer and that monitoring performed with another manufacturer's sampling tubes will be considered invalid unless otherwise approved by EPA and ODEQ.
  - v. A plan for the day of the week the sampling will be conducted. It must be the same day each week (e.g. Tuesday).
  - b. Within seven days of receipt of comments from either EPA or ODEQ on the sampling plan: Revise the sampling plan to address the comments.
  - c. Beginning May 16, 2016 until October 1, 2016: Sample concentrations of H<sub>2</sub>S, SO<sub>2</sub>, benzene, chloroform, naphthalene, 1,4-dioxane, and chlorine gas emissions at the Facility once per week in accordance with the sampling system manufacturer's instructions and the sampling plan (as revised).
  - d. Submit records of the sampling results on a bi-weekly basis as follows:
    - i. For each bimonthly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the records for the sampling performed during for that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the 6<sup>th</sup> of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month).
6. Conduct odor inspections at the Facility as follows:
- a. By May 2, 2016: Develop and submit for review a plan to monitor for odors once per shift at the Facility. The plan must include:
    - i. The locations in the Facility to be monitored for odor once per shift including, at a minimum, a reading at the north, south, east, and west fence lines of the Facility; a reading directly downwind of the plumes of all burners, boilers, heaters, incinerators, or other emission points at the fence line of the Facility or any closer location just before where the plume reaches the ground before the fence line; and any other location where odors would reasonably be detected.
    - ii. A recordkeeping plan for the inspections that includes for each location:
      1. The time and date of the inspection;
      2. The name of the person conducting the inspection;
      3. Any odor perceived (even if usual);
      4. If an odor is perceived:
        - a. The product being processed at the time;
        - b. Any known issues or abnormal operating conditions for process vessels or pollution control equipment at the time;
        - c. The classification of the odor as usual or abnormal;
        - d. For odors classified as usual, identification of the suspected causes;

- e. For unusual or abnormal odors, a description of the odor and any suspected causes;
    - f. The estimated wind direction at the time of the inspection; and
    - g. A sample record for conducting the inspection.
  - b. Within seven days of receipt of comments from either EPA or ODEQ on the inspection plan: Revise the inspection plan to address the comments.
  - c. Beginning May 16, 2016 until October 1, 2016: Inspect for odors at the Facility in accordance with the inspection plan (as revised).
  - d. Submit records of the inspections on a bi-weekly basis as follows:
    - i. For each bimonthly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the inspection records for each inspection that occurred during that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the 6<sup>th</sup> of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month).
7. By May 2, 2016: Submit a description of the residence time of each processed material (used oil, oily liquid or material, etc.) in the system at the Facility and a diagram of the process. For example, for a given Delivery of used oil, describe how long is it processed in each phase, how those phases are sequenced, and whether and for how long the used oil is held in between the various process stages.
8. By May 2, 2016: Submit the following information for each boiler, incinerator, or other emission point at the Facility for the configuration of the emission point/stack:
- a. Stack height;
  - b. Stack release direction (horizontal or vertical);
  - c. Stack cross sectional shape (i.e., circular, rectangular, square);
  - d. Stack area;
  - e. Stack exhaust gas flow rate; and
  - f. Details regarding any stack release obstruction (i.e., rain caps).
9. Conduct a leak inspection of the Facility as follows:
- a. By May 2, 2016: Develop and submit for review a plan to inspect for leaks at the Facility that:
    - i. Uses EPA Reference Method 21, 40 C.F.R. Part 60, Appendix B;
    - ii. Defines as a leak emissions with a VOC concentration of 500 ppm or more;
    - iii. Identifies the equipment at the Facility to be inspected for leaks, which shall include each pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, valve, and flange or other connector in VOC service, process unit, storage vessel;



- iv. Is consistent with the test methods and procedures and recordkeeping requirements of 40 C.F.R. §§ 63.180-182; and
    - v. Contains a sample record for conducting the inspection.
  - b. Within seven days of receipt of comments from either EPA or ODEQ on the inspection plan: Revise the inspection plan to address the comments.
  - c. By June 1, 2016: Conduct a leak inspection at the Facility in accordance with the leak inspection plan (as revised).
  - d. By June 21, 2016: Submit records of the leak inspection. For all leaks identified, document any repair efforts made in response to identified leaks and provide them with the records of the leak inspection.
10. By May 2, 2016: Submit the following information for each carbon absorption unit at the Facility:
- a. The designation of the unit;
  - b. The location of the unit;
  - c. The burners, boilers, heaters, incinerators, or other emission points that can be routed to the unit;
  - d. The capacity of unit;
  - e. Any design records for the unit or other commissioning documents;
  - f. Each time the carbon in the unit has been replaced during the last five years; and
  - g. Reports or other documentation of any testing that has been conducted on new, used, or spent carbon for the unit.
11. Beginning May 2, 2016 until October 1, 2016: Maintain and submit records for each carbon absorption unit at the Facility as follows:
- a. Keep records of:
    - i. The designation of the unit;
    - ii. The location of the unit;
    - iii. The burners, boilers, heaters, incinerators, or other emission points that can be routed to the unit;
    - iv. The capacity of unit;
    - v. Each time the carbon in the unit has been replaced; and
    - vi. Reports or other documentation of any testing conducted on new, used, or spent carbon for the unit.
  - b. Submit the information required by Paragraph 11.a above as follows:
    - i. For each bimonthly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the records for the monitoring conducted during that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the 6<sup>th</sup> of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month). The first submittal shall be sent May 21<sup>st</sup> and will cover the time period from the last date included in the May 2, 2013 response to Paragraph 10 above through May 15, 2016.

